

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 8/28/2024
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BY ELECTRONIC MAIL & ECF

The Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v Villafane, Juan Kuang*
21 cr 93 (VM)

Dear Judge Marrero:

Please allow this letter as a motion to amend Juan Kuang's conditions of pretrial release bond to remove the condition of home detention with GPS monitoring and add as conditions of his pretrial release, a curfew as directed by Pretrial Services with location monitoring. His pretrial services officer, Marlon Ovalles supports this application and recommends the above amendment to Mr. Kuang's pretrial release. The Government defers to the position of Senior Pretrial Officer Ovalles.

Mr. Juna Kuang is currently released on a \$150,00 bond with conditions, *inter alia*, of home detention and with GPS monitoring, secured by \$150,000, cash of \$5,000, and signatures of seven suretors- consisting of family members and his supervisor from work. See Dkt. Entry # 132

As confirmed by Officer Ovalles, Mr. Kuang is doing well on release.

1. He has maintained employment;
2. He has attended all his treatment sessions;
3. His drug tests have been negative for illegal substances;
4. He has paid down his child support arrears;
5. He cooperated fully with his pretrial officer-attending all meetings with his Officer Ovalles and providing any documents requests by his officer;
6. He supports his wife and child;
7. He has enrolled in the SDNY Focus Forward program; and
8. Significantly, he has been accepted into college for the full semester.

Mr. Kuang is especially excited about college and eagerly looks forward to obtaining a degree in higher education.

In light of Mr. Kuang's current schedule a curfew set by pretrial to accommodate all of Mr. Kuang's commitments is appropriate. Mr. Kuang has demonstrated that he can be trusted to adhere to the conditions of release and actually thrive.

Wherefore, I respectfully request the Court amend Mr. Kuang's conditions of bond, removing the condition of home detention with GPS monitoring and in its stead order that Mr. Kuang is subject to a curfew as directed by pretrial services with location monitoring. All other conditions of bond previously ordered shall remain in full force and effect.

Respectfully submitted,

/s/

Donna R. Newman

Cc: Sr. PTO Marlon Ovalles

AUSA Michael Herman

AUSA Thomas Wright

